

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

GREGORY COLBURN et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

DEFENDANTS' SUPPLEMENTAL PROPOSED JURY INSTRUCTIONS

Pursuant to Fed. R. Crim. P. 30, Defendants Gamal Abdelaziz and John Wilson (“Defendants”) respectfully request that the Court give the jury instructions attached as Exhibit A. More specifically, both Defendants request that the Court give the first and second instructions set forth in Exhibit A, and Defendant John Wilson requests that the Court give the third, fourth, fifth, and sixth instructions set forth in Exhibit A. Defendants reserve the right to submit additional supplemental requested jury instructions. Further, Defendants reserve the right to supplement, modify, or withdraw the attached instructions in light of, among other things, the evidence ultimately admitted at trial.

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Respectfully submitted,

/s/ Brian T. Kelly

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DATED: September 3, 2021

CERTIFICATE OF SERVICE

I, Michael Kendall, hereby certify that on September 3, 2021 this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Michael Kendall